

# EXHIBIT C

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*Additional counsel listed on Exhibit A*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:	)	Case No. 19-30088 (DM) (Lead Case)
PG&E CORPORATION	)	Chapter 11
- and -	)	(JOINTLY ADMINISTERED)
PACIFIC GAS AND ELECTRIC COMPANY,	)	DECLARATION OF CITY OF WARREN
	)	POLICE AND FIRE RETIREMENT
	)	SYSTEM IN SUPPORT OF SECURITIES'
Debtors.	)	PLAINTIFFS' MOTION FOR THE
	)	APPLICATION OF BANKRUPTCY RULE
	)	7023 AND THE CERTIFICATION OF A
	)	CLASS OF SECURITIES CLAIMANTS

☒ Affects Both Debtors

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 I, Scott D. Salyers, declare as follows:

2 1. I am the Chairman for Named Plaintiff, City of Warren Police and Fire Retirement  
3 System ("City of Warren"), and I am authorized to make this declaration. City of Warren is a  
4 governmental defined benefit pension plan with approximately \$290 Million in assets under  
5 management. I am the person at City of Warren who is primarily responsible for monitoring and  
6 directing this litigation on behalf of City of Warren.

7 2. City of Warren's transactions in PG&E's securities during the Class Period, and in  
8 PG&E bonds prior to the petition date in bankruptcy court, are identified in the attached Exhibit  
9 1 ("Ex. 1"). Ex. 1; *see also* Third Amended Consolidated Class Action Complaint for Violation  
10 of the Federal Securities Laws (District Court ECF No. 121) ("Complaint").

11 3. I, on behalf of City of Warren, have monitored the progress of this litigation. I have  
12 regularly conferred with Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or "Securities  
13 Act Counsel") concerning the litigation and overseen the efforts of Robbins Geller in prosecuting  
14 the case. For example, I have received and reviewed documents filed with the Court including,  
15 but not limited to, the Complaint, legal briefs related to Defendants' motions to dismiss the  
16 Complaint in the District Court, legal briefs related to Debtors' objections to claims brought in  
17 bankruptcy court, and the instant Motion to Certify Class, Appoint Class Representative and  
18 Appoint Class Counsel. I have consulted with Robbins Geller concerning key events in the  
19 litigation, including document collection and review and deposition scheduling.

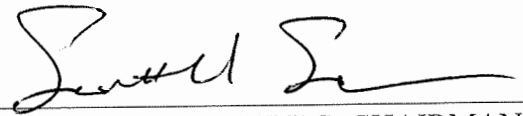
20 4. City of Warren is committed to continuing to actively direct this litigation and  
21 maximize the recovery for the Class. As Named Plaintiff and proposed Class Representative, City  
22 of Warren understands that it owes fiduciary duties to all members of the Class to provide fair and  
23 adequate representation and intends to continue to work with Securities Act Counsel to obtain the  
24 maximum recovery possible for the entire Class consistent with good faith and meritorious  
25 advocacy.

26 5. City of Warren also intends to continue to provide fair and adequate representation  
27 by, among other things, further considering the advice and further directing the efforts of Securities  
28 Act Counsel and proposed Class Counsel, Robbins Geller. City of Warren is aware that Robbins

1 Geller has substantial experience and expertise in prosecuting securities class actions and believes  
2 that Robbins Geller possesses the necessary financial and human resources to prosecute the case  
3 effectively.

4 6. City of Warren will not accept any payment for serving as Class Representative  
5 beyond its pro rata share of any recovery, except for reimbursement of such reasonable costs and  
6 expenses (including lost wages) directly relating to the representation of the Class as ordered or  
7 approved by the Court.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19  
9 day of December, 2024 in Warren, Michigan.

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12 SCOTT D. SALYERS, CHAIRMAN  
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**EXHIBIT A**  
**COUNSEL**

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# EXHIBIT 1

**SCHEDULE A**  
**SECURITIES TRANSACTIONS**

**Common Stock**

<u>Date Acquired</u>	<u>Amount of Shares Acquired</u>	<u>Price</u>
05/29/2015	21	\$53.47
12/18/2015	19	\$53.11
02/29/2016	15	\$56.73
03/31/2016	9	\$59.72
05/05/2016	956	\$59.15
05/31/2016	16	\$60.08
06/24/2016	65	\$62.66
07/06/2016	18	\$65.39
09/14/2016	23	\$61.43
12/16/2016	23	\$61.04
02/28/2017	19	\$66.75
03/31/2017	19	\$66.36
09/15/2017	29	\$70.28
12/15/2017	27	\$53.05
03/16/2018	25	\$45.08

<u>Date Disposed</u>	<u>Amount of Shares Disposed</u>	<u>Price</u>
07/08/2016	6	\$64.83
03/01/2017	8	\$65.85
03/27/2017	142	\$67.19
06/23/2017	27	\$68.03
06/22/2018	125	\$42.92
09/21/2018	223	\$46.79
10/15/2018	1,170	\$47.84

\*Opening position of 1,081 shares for common stock.

**Bond**

<u>Date Acquired</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
12/21/2017	3.3% due 12/01/2027	75,000	\$98.89
05/01/2018	3.3% due 12/01/2027	25,000	\$93.09
05/14/2018 <sup>e</sup>	3.3% due 12/01/2027	100,000	\$92.51
<u>Date Disposed</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
05/14/2018 <sup>e</sup>	3.3% due 12/01/2027	100,000	\$92.51
01/14/2019	3.3% due 12/01/2027	100,000	\$78.00

<sup>e</sup>Debt exchange offer.

Prices listed are rounded up to two decimal places.